UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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STEPHANI GALVEZ CHAVEZ, on behalf of herself and the Class,

Plaintiff,

v.

SEAMORE'S ON ICE LLC; 1270 3RD RESTAURANT LLC; d/b/a Seamore's 390 BROOME RESTAURANT LLC; d/b/a Seamore's

161 8TH AVE RESTAURANT LLC; d/b/a Seamore's

S OUT EAST LLC;

d/b/a Seamore's

S UP TOP LLC;

d/b/a Seamore's

S DOWN BELOW LLC;

d/b/a The Hull Sports Bar

S BIG SWING LLC;

d/b/a Seamore's

JAY WAINWRIGHT; and MICHAEL

CHERNOW

Defendants.

Case No: 23-cv-07141

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between the parties in the above captioned action, acting by means of their respective counsel, that Defendants shall have until September 29, 2023 to answer, move or otherwise respond with respect to the Complaint in the above matter. All Parties have agreed to this extension of time.

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IT IS FURTHER STIPULATED AND AGREED that Defendants also agree to waive all defenses to invalid service of process and accept service of the Complaint and all amendments thereon.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties that this Stipulation may be signed by facsimile or electronic copy which shall be demed an original, and may be executed in one or more counterparts, but which collectively will constitute one and the same instrument.

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For Defendants:

By: /s/ Wayne Kreger

Wayne Kreger, Esq. Law Offices of Wayne Kreger 305 Broadway, Suite 700 New York, New York 10007 Telephone: (212) 500-3270 wayne@kregerlaw.com

Date: August 14, 2023

For the Plaintiff;

C.K. Lee, Esq.

Lee Litigation Group, PLLC 148 West 24th Street, 8th Floor New York, New York 10011 Telephone: (212) 465-1180

cklee@leelitigation.com

Date: August 14, 2025

ORDER

Pursuant to the Parties' stipulation, IT IS SO ORDERED, Defendants shall have until September 29, 2023 to answer, move or otherwise respond with respect to the Complaint in the above matter.

DATED: August 15, 2023

Honorable ess M. Kurman United States District Judge